

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Northern District of Texas

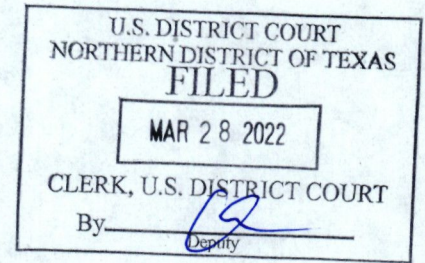
United States of America

v.

Case No.

2:22-MJ-50

DANE HOFFMAN

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 25, 2022 in the county of Potter in the
Northern District of Texas, the defendant(s) violated:

*Code Section**Offense Description*

Title 18, United States Code,
 Sections 922(g)(1) and 924(a)(2)

Convicted Felon in Possession of a Firearm.

This criminal complaint is based on these facts:

see attached affidavit in support of complaint.

☒ Continued on the attached sheet.

A handwritten signature in blue ink, appearing to read "Christopher Brown".

Complainant's signature

Christopher Brown, DEA SA

Printed name and title

Attested to in accordance with the requirements of Fed. R. Crim. P 4.1 by telephone:

Date: 03/28/2022

A handwritten signature in blue ink, appearing to read "Lee Ann Reno".

*Judge's signature*City and state: Amarillo, Texas

Lee Ann Reno, U.S. Magistrate Judge

Printed name and title

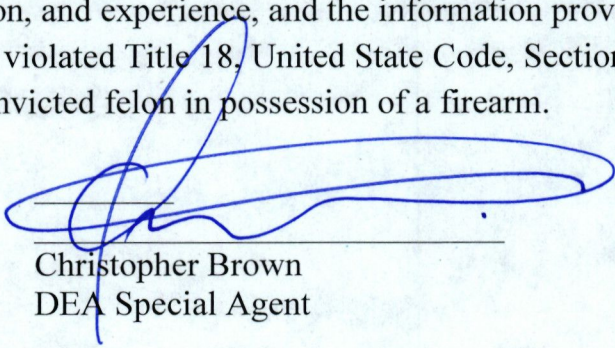
No. 2:22-MJ-50

AFFIDAVIT IN SUPPORT OF COMPLAINT

I, Christopher Brown, being sworn, depose and state as follows:

- 1) I am a Special Agent (SA) with the Drug Enforcement Administration (DEA).
- 2) I am assigned to the DEA's Amarillo Resident Office (ARO). I was hired as a Special Agent with DEA in June 2019, and completed DEA Basic Agent Training Academy, located in Quantico, Virginia in October 2019. In connection with my duties and responsibilities as a Special Agent, I have received extensive training in the field of narcotics trafficking investigations, including but not limited to, conducting surveillance, smuggling, undercover operations, methods of packaging, utilizing confidential sources, executing arrest and search warrants. Prior to my employment with the DEA, I was a Vermont State Trooper for 7 years. During that time, I have made narcotic arrests and assisted in narcotics investigations.
- 3) This affidavit is made in support of a complaint and arrest warrant for Dane HOFFMAN. I am familiar with the information contained in this affidavit based upon my own personal investigation, as well as conversations with other law enforcement officers involved in this investigation.
- 4) On March 24, 2022, Drug Enforcement Administration (DEA) Special Agent (SA) Chris Brown received a federal search warrant signed by United States Magistrate Judge Lee Ann Reno for the property of 4210 Albert Ave, Amarillo, TX.
- 5) On March 25, 2022, Drug Enforcement Administration DEA Agents and Amarillo Police Department (APD) Narcotics agents executed the above federal search warrant. During the execution of the search warrant Dane HOFFMAN was located in the living laying face down on the ground. HOFFMAN was the lone occupant of the residence. HOFFMAN rents the residence and lives alone. His eight-year-old daughter visits him occasionally.
- 6) During the search of the residence, agents located a chrome 1911 Remington Rand Inc. .45 caliber semi-automatic pistol on the top shelf of the kitchen cabinet. The pistol was loaded with one magazine and 7 bullets. Agents also located several items of drug paraphernalia, scales, and personal items, including mail addressed to Hoffman, in the kitchen of the residence. In addition, agents also located approximately 20 grams of a hard dark brown like substance of suspected black tar heroin in a magnet box further located in the master bedroom closet.

- 7) DEA SA Brown and APD Narcotics Agent Seth Moore conducted a mirandized interview with HOFFMAN. During the interview, Hoffman stated he was a heroin user and never sold drugs to anyone and that above hard dark brown substance of suspected black tar heroin was his for personal use.
- 8) On April 21, 2010, HOFFMAN was convicted of Manufacture or Delivery of a Controlled Substance in violation of Texas Health and Safety Code Section 481.112(e), a First-Degree Felony punishable by more than one year in prison. Hoffman was on parole until 2017, indicating that HOFFMAN knew or should have know that he had been previously convicted of a felony. During a mirandized interview, SA Brown asked HOFFMAN if he was a convicted felon, and HOFFMAN said that he was a felon.
- 9) Remington Rand firearms are not manufactured in Texas. Therefore, the firearm described in this complaint must have traveled in or affected interstate or foreign commerce; that is, before HOFFMAN possessed the firearm, it had traveled at some time from one state to another or between any part of the United States and any other country.
- 10) Based on my training, education, and experience, and the information provided to me, I believe that Dane HOFFMAN violated Title 18, United State Code, Sections 922(g)(1) and 924(a)(2), by being a convicted felon in possession of a firearm.



Christopher Brown
DEA Special Agent

Attested to by telephone in accordance with the requirements of Fed. R. Crim. P. 4.1:

3/28/22 at Amarillo, TX
Date City and State

Lee Ann Reno U.S. Magistrate Judge
Name and Title of Judicial Officer

Lee Ann Reno
Signature of Judicial Officer


Meredith Pinkham
Assistant U.S. Attorney